

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

POLAROID CORPORATION,

Plaintiff and Counterclaim-Defendant,

v.

HEWLETT-PACKARD COMPANY,

Defendant and Counterclaim-Plaintiff.

C.A. No. 06-738 (SLR)

PUBLIC VERSION

**DECLARATION OF WILLIAM J. MARSDEN, JR.
IN SUPPORT OF HEWLETT-PACKARD COMPANY'S MOTION TO BIFURCATE
LIABILITY AND DAMAGES AND STAY DAMAGES DISCOVERY**

Dated: November 6, 2007

Redacted: November 19, 2007

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IN SUPPORT OF HEWLETT-PACKARD COMPANY'S MOTION TO BIFURCATE
LIABILITY AND DAMAGES AND STAY DAMAGES DISCOVERY**

I, WILLIAM J. MARSDEN, JR., provide the following declaration in the above-captioned matter based on my own personal knowledge except where stated otherwise, and if called to do so, could and would competently testify as follows:

1. I am a principal in the law firm of Fish & Richardson P.C., counsel of record for Defendant Hewlett-Packard Company ("HP") in the above entitled matter.

2. I make this declaration based on my own knowledge and could and would testify competently to the matter contained therein.

3. Attached hereto as Exhibit A is a true and correct excerpted copy of Polaroid's First Set of Interrogatories to HP.

4. Attached hereto as Exhibit B is a true and correct excerpted copy of HP's First Supplemental Interrogatory Response to Polaroid's First Set of Interrogatories (No. 15).

5. Attached hereto as Exhibit C is a true and correct excerpted copy of HP's First Set of Interrogatories (No. 1-19).

6. Attached hereto as Exhibit D is a true and correct excerpted copy of Polaroid's First Supplemental Response to HP's First Set of Interrogatories.

7. Attached hereto as Exhibit E is a true and correct copy of a letter from G. Courtney Holohan to Bradley D. Coburn dated Oct. 19, 2007.

8. Attached hereto as Exhibit F is a true and correct .of a letter from Bradley D. Coburn to G. Courtney Holohan dated Oct. 17, 2007.

9. Attached hereto as Exhibit is G is a letter from Bradley D. Coburn to G. Courtney Holohan dated Oct. 22, 2007.

10. Attached hereto as Exhibit H is a letter from Bradley D. Coburn to G. Courtney Holohan dated Oct. 30, 2007.

11. Attached hereto as Exhibit I is a true and correct excerpted copy of HP's Interrogatory No. 12 to Polaroid.

12. Attached hereto as Exhibit J is a true and correct excerpted copy of Polaroid's First Supplemental Response to HP's First Set of Interrogatories.

13. Attached hereto as Exhibit K is a letter from G. Courtney Holohan to Bradley D. Coburn dated Oct. 18, 2007.

14. Attached hereto as Exhibit L is a true and correct copy of a letter from G. Courtney Holohan to Bradley D. Coburn dated Oct. 22, 2007.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 6, 2007, in Wilmington, Delaware.

/s/ William J. Marsden, Jr.
William J. Marsden, Jr. (#2247)

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2007, I electronically filed with the Clerk of Court the foregoing PUBLIC VERSION of the DECLARATION OF WILLIAM MARSDEN IN SUPPORT OF HEWLETT-PACKARD COMPANY'S MOTION TO BIFURCATE LIABILITY AND DAMAGES AND STAY DAMAGES DISCOVERY using CM/ECF which will send electronic notification of such filing(s) to the following counsel:

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In addition, service will be made on the following counsel of record as indicated:

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/s/ William J. Marsden, Jr.
 William J. Marsden, Jr. (#2247)

Exhibit A

REDACTED
IN ITS ENTIRETY

Exhibit B

**REDACTED
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Exhibit C

**REDACTED
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Exhibit D

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Exhibit E

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Exhibit F

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Exhibit G

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Exhibit L

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